



## HARNEY COUNTY

Planning Department  
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June 2, 2010

Department of Land Conservations and Development Commission (LCDC)  
635 Capitol St. NE, Suite 150  
Salem 97301-2540

**RE: Proposed Temporary Rule Regarding Private Campgrounds on Lands Planned and Zoned for Exclusive Farm Use.**

Dear Commission Chair VanLandingham,

The construction of wind energy facilities in Harney County is in the very near future. In March/April of 2011 the Echanis Wind Facility is scheduled to begin construction and in a few years Horizon Wind is proposing to begin construction of their respective site. Two years ago it came to our attention that during the construction phase of these facilities a large number of temporary workers is hired (locally or out of county) to develop the site. In 2008, Harney County Planning staff worked with DLCD (Jon Jinings) and a local landowner to site a potential temporary RV campground which would allow for roughly 30-50 vehicles to reside for a period of approximately 9 months (the amount of time it is projected to construct the Echanis facility). One large challenge facing the landowners was the inability to utilize the local/state land use code to accomplish the temporary site without launching into an exception or uncertain conditional use permit process. While ultimately the landowner decided to withdrawal the potential proposal, the question remained as to how to enable this particular temporary activity through Local/State code. Before LCDC today is a proposal for language which gets close to providing for this use. Please consider the following as Harney County's recommendation:

*(The use is short-term and should be reviewed as such)* The draft language provides between 5-16 campsites to be reviewed through what would amount to be a conditional use process (locally). Harney County believes this level of review is unnecessary as the proposal would have impacts which are inherently temporary. It is our view that these types of temporary campsite situations would involve non-discretionary review, more specifically the mere application of local siting standards, i.e., site plan review (wetlands/flood zone/water use, etc...). From discussing the nature of these sites with the wind energy facility developers in our county, it is

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SUBMITTED BY: Brandon McMullen

our understanding that the majority of this type of workforce requires very little in the means of facilities for their accommodations, and in fact it is preferred by them to reside in close proximity to the work site if at all possible. In Harney County's situation, any established RV parks that would facilitate a more than basic level of accommodation are located roughly 25 miles away from the project site (Echanis) and have a limited number of sites ranging from as few as 1-2 to 20. The closest city in Harney County is located over 100 road miles away. A simple site plan/zoning permit authorization by staff for a temporary use in conjunction with an approved permit is all that is truly needed.

*(Critically tied to the economic development of Harney County)* To introduce an additional layer of land use review not only provides another unnecessary appeal opportunity for a community-approved project, but also adds to the pre-construction timeline. In Harney County the 'building season' is considerably short. For instance, the window of opportunity to begin construction of the Echanis project will be tied to three major aspects: (1) the success of the NEPA process (BLM) tied to the proposed transmission line from the project site to the existing transmission system, (2) the satisfaction of the conditions set forth in the developer's CUP, and (3) the time of year when both 1 and 2 are completed... as the seasonal conditions dictate (especially at the south-end of our county) when and where one can build. The need to apply for an additional conditional use permit (or a number of permits) will inhibit this crucial development timeline.

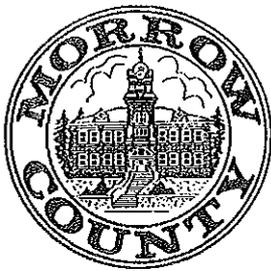
Harney County is very much in favor of adding the ability to site this temporary use, as it is a very important factor of the development of wind energy facilities in our county. However we recommend LCDC's rule utilize language which would enable these temporary sites through local site review procedures as opposed to applying an unwarranted permitting procedure to a time and economically sensitive development process.

Thank you for your time and consideration of our letter. Perhaps by providing for the process as described in this letter and reviewing the activities of these temporary campsites over the span of the next few months, we will be able to effectively evaluate the use more objectively against the local siting processes used to site them.

Sincerely,



Brandon M. M<sup>c</sup>Mullen,  
Harney County Planning Director



## COUNTY COURT

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June 2, 2010

Richard Whitman, Director  
Department of Land Conservation and Development  
635 Capitol St. NE, Suite 150  
Salem 97301-2540

John VanLandingham, Chair  
Land Conservation and Development Commission  
635 Capitol St. NE, Suite 150  
Salem 97301-2540

RE: Temporary Administrative Rules  
Private Campgrounds on Farm Land

TERRY K. TALLMAN, Judge  
email: ttallman@co.morrow.or.us  
Boardman, Oregon  
LEANN REA, Commissioner  
email: lrea@co.morrow.or.us  
Boardman, Oregon  
KEN GRIEB, Commissioner  
email: kgrieb@co.morrow.or.us  
Heppner, Oregon

EXHIBIT: 10 AGENDA ITEM: 8  
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COMMISSION  
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SUBMITTED BY: *Morrow Co.*

Director Whitman:

With renewable energy development comes economic benefit. With economic benefit comes temporary workers. The recent groundbreaking at the Shepherds Flat wind farm is expected to bring Morrow County a share of 750 temporary workers involved in the construction of the wind farm. The communities along the Willow Creek Valley—lone, Lexington and Heppner—are all doing their part to address housing needs. But the County also expects to participate in finding suitable temporary workforce housing. Other projects also are anticipated, among them the Carty Generating Station, which also will bring a large number of temporary workers.

Our Planning Director, Carla McLane, has shared with us the recent work of Jon Jinnings to assist rural counties in addressing the concerns of temporary workers and in the need for housing. Many of these workers choose to live in recreational vehicles, but current park standards make this alternative difficult to pursue. The proposed temporary administrative rules will assist us with covering this construction season and work on permanent rules this fall will move us toward a balanced long-term approach to this emerging concern.

The Morrow County Court would like to urge the Commission to adopt the proposed temporary administrative rules this month. That action should be followed by a rulemaking effort to draft final administrative rules for your consideration later in the Fall of 2010. Morrow County stands ready to help. We anticipate at least two applications under the temporary rules, possibly more once word of this option reaches our community. We would be more than willing to share our experiences with the temporary administrative rule and provide suggestions for its improvement.

Thank you for your consideration of the temporary administrative rules. Should you have any questions about this letter or want to follow up with our Planning Director, Carla McLane, she can be reached at 541-922-4624 or by email at cmclane@co.morrow.or.us.

Cordially,

Handwritten signatures of Terry K. Tallman, Ken Grieb, and Leann Rea.  
Terry K. Tallman  
Judge  
Ken Grieb  
Commissioner  
Leann Rea  
Commissioner